

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

A.C., by his next friend, mother and legal)	
guardian, M.C.,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
METROPOLITAN SCHOOL DISTRICT OF)	
MARTINSVILLE;)	
PRINCIPAL, JOHN R. WOODEN MIDDLE)	
SCHOOL, in his official capacity,)	
)	
Defendants.)	

Declaration of M.C.

M.C., being duly sworn, says that:

1. I am the mother of A.C., who is currently 12 years old. I am his legal custodian and guardian.
2. A.C. is transgender, and I have filed this case for him as his mother and next friend, seeking to force his school and the school system to treat him as male, which includes allowing him to use male restrooms, allowing him to participate on the boys' soccer team, and requiring that school personnel refer to him by his male name and refer to him using male pronouns.
3. I understand that my son will be known in this case by his initials, but without an order from this Court my actual name will be used in the case.

4. This case concerns the very private matter of my son's gender identity and the process he is going through to be acknowledged by the world to be a boy, and I would like to protect his privacy and safety to the greatest extent possible.

5. I understand that the issues raised in this case, particularly the ability of a transgender student to use the bathrooms appropriate to their gender identity, sometimes provoke hostile responses by members of the public who are opposed to transgender youth being treated in a manner that is consistent with their gender identities.

6. I believe that there are some, if not many, adults in Martinsville who would be opposed to the idea of my son being able to use the boys' bathrooms at this school.

7. My son and I have a different last name. But the John R. Wooden Middle School has less than 700 students. Martinsville is a small community and once my name was known and the fact that my son is in 7th grade at the John R. Wooden Middle School, it would be easy to identify him as the plaintiff in this case.

8. I want to avoid, to the greatest extent possible, anything negative being directed towards my son.

9. I understand that if my request to go by my initials is granted my actual name will be disclosed to opposing counsel when opposing counsel appear in the case. However, to protect my son I would like to be publicly known in this litigation by my initials, M.C.

Verification

I verify under penalty of perjury that the foregoing is true and correct.

Executed on: _____

MC C 12/1/2021
M.C.

Prepared by:

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